

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA**

STEWART ABRAMSON and JAMES
EVERETT SHELTON, individually and on
behalf of a class of all persons and entities
similarly situated,

Plaintiffs,

MONICA ABBOUD, individually and on
behalf of all others similarly situated,

Plaintiff-Intervenor,

v.

AGENTRA, LLC, ANGELIC
MARKETING GROUP L.L.C., and
MATTHEW JONES,

Defendants.

Case No. 2:18-cv-00615-PLD

CLASS ACTION

MOTION TO INTERVENE AND TO MODIFY PROTECTIVE ORDER

Plaintiff-Intervenor Monica Abboud (“Plaintiff-Intervenor” or “Abboud”), on behalf of herself and a certified class in the case of *Abboud v. Agentra, LLC*, 3:19-cv-00120-X (N.D. Tex.), hereby respectfully submits this Motion to intervene in this matter and to modify the protective order between Plaintiffs Stewart Abramson and James Everett Shelton (“Plaintiffs”) and Defendant Agentra, LLC (“Defendant” or “Agentra”) (collectively “the Parties”). This Motion is based on the exhibits attached hereto, the concurrently filed Memorandum of Points and Authorities, oral argument of counsel, and any other matter that may be submitted at the hearing.

Respectfully submitted,

Dated: October 28, 2020

By: /s/ Stuart C. Gaul, Jr.
One of Plaintiff-Intervenor’s Attorneys

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Attorneys for Plaintiff-Intervenor and the Classes

* *Pro Hac Vice* to be filed

CERTIFICATE OF SERVICE

I hereby certify that the above papers were filed through the Court's ECF system, which will serve the papers electronically to all counsel of record.

/s/ Stuart C. Gaul, Jr.